




Ex Kano S. Sams II
esams@glancylaw.com
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
T: 310.201.9150

January 21, 2025

BY ECF

The Honorable Dale E. Ho
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED. The parties shall file their opening briefs by February 13, 2025, and their consolidated response/reply briefs by March 28, 2025. SO ORDERED.



Dale E. Ho
United States District Judge
Dated: January 23, 2025
New York, New York

Re: Srinivasan Venkataraman v. Kandi Tech. Grp., Inc. et al.
Case No. 20 CIV 8082 (DEH)

Dear Judge Ho:

Pursuant to Section 2(a) of the Court’s Individual Rules and Practices in Civil Cases, Lead Plaintiff Tom Brooks (“Plaintiff”) hereby submits this letter motion for an extension of time related to the parties’ submission of motions for summary adjudication and/or summary judgment.

On November 27, 2024, the Court issued a memo endorsement ordering that the parties shall file opening briefs related to motions for summary adjudication and/or summary judgment by January 30, 2025, and that the parties shall file consolidated response/reply briefs by March 14, 2025. Counsel for Plaintiff, however, hereby seeks a two-week extension of these deadlines because of several obligations in other matters, including two filings due January 23 and 24 that will involve substantial work, and an out-of-town hearing scheduled January 30, 2025. Accordingly, Plaintiff requests an extension to enable the parties to file opening briefs related to motions for summary adjudication and/or summary judgment by February 13, 2025, and to file consolidated response/reply briefs by March 28, 2025. There have been no previous requests for adjournment or extension related to these deadlines, this request does not affect any other dates scheduled in the action, and there is currently no scheduled date of appearance before the Court. Counsel for Plaintiff has conferred with counsel for Defendants Kandi Technologies Group, Inc., Xiaoming Hu, Cheng Wang, Liming Chen, Jerry Lewin, and Henry Yu (collectively “Defendants”), and Defendants consent to the requested relief. *See Ballast v. Workforce7 Inc.*, No. 20-CV-03812 (ER), 2025 WL 49932, at *5 (S.D.N.Y. Jan. 7, 2025) (granting request for extension where opposing party did not oppose request).

The parties thank the Court for its attention to this matter.

Very truly yours,

s/Ex Kano S. Sams II

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